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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**United States of America,**

Plaintiff,

v.

**Csaba John Csukás,**

Defendant.

**Case No.:** CR 24–152 WHO

**Defendant’s Response to Order  
Directing Parties to Date Exhibits**

**Hearing Date:** October 8, 2024

**Hearing Time:** 3:30 p.m.

The defense respectfully submits the following dates for postings in exhibits referenced in the parties Motions *In Limine* and the Court’s recent Order. *See* Dkt. No. 67. The proposed defense exhibits are tweet’s from S.B.’s social media account from X. The defense is not seeking a hearsay exception for the exhibits and does not seek to admit the exhibits for the truth as the matter but rather as proof of S.B.’s bias and whether such bias affects the credibility of S.B.’s testimony. The reliability of a witness may be attacked with general evidence of untrustworthiness or through more particularized attacks to reveal “biases, prejudices, or ulterior motives” that relate to the testimony. *Averilla v. Lopez*, 862 F. Supp. 2d 987, 998 (N.D. Cal. 2012) *quoting Davis v. Alaska*, 415 U.S. 308, 316,

(1974).

Exhibit No.	Description	Bates Number	Dates Associated with Postings
101	Video Recording, Shlomi Barsheshet X (Twitter) Postings	FPD000135	January – July 2024
102	Photo, Shlomi Barsheshet X (Twitter) Posting of pro-Palestine protestors with text above “I will admit that, nearly eight months into this nightmare, and somehow I’m still struck by the sheer cruelty and utter inhumanity of so many of those who rationalize terror”	FPD000138	June 2, 2024
103	Photo, Shlomi Barsheshet X (Twitter) Posting, header from protected account.	FPD000139	September 2024
104	Photo, Shlomi Barsheshet X (Twitter) Posting regarding hostages and a reposting from a satirical site regarding the numbers of people from Gaza killed in a fictitious Israeli hostage rescue.	FPD000140	June 8, 2024
105	Photo, Shlomi Barsheshet X (Twitter) Posting repost of a photo with “Anti-Zionism is Antisemitism” and posting about soldiers in Gaza discussing physics.	FPD000141	July 2024
106	Photo, Shlomi Barsheshet X (Twitter) Posting regarding hostage rescue	FPD000142	June 10, 2024
107	Photo, Shlomi Barsheshet X (Twitter) Posting regarding the loss of lives in Rafah, a city in the southern Gaza Strip, Palestine and the firing of an individual after he desired “to exile Jews back to Polad, Ukraine, etc.”	FPD000143	May 28, 2024
108	Photo, Shlomi Barsheshet X (Twitter) Posting reposting regarding the number of people killed in Gaza and standing for Israel.	FPD000144	April 12, 2024
109	Photo, Shlomi Barsheshet X (Twitter) Posting, posting from newspaper with headline reading “Arabs Invade Palestine” with re-post reading “History bites hard.”	FPD000145	June 16, 2024
110	Photo, Shlomi Barsheshet X (Twitter) Posting regarding a re-post stating that “On September 11th 2001, thousands of Palestinians, including children, took to the streets to CELEBRATE the Twin Towers attack after 2,977 people lost their lives.”	FPD000146	April 22, 2024

Exhibit No.	Description	Bates Number	Dates Associated with Postings
111	Photo, Shlomi Barsheshet X (Twitter) Posting regarding allegations that actors would be portraying injured individuals after an attack on Rafah, a city in the southern Gaza Strip, Palestine.	FPD000147	May 6, 2024

Dated: October 6, 2024

Respectfully submitted,

JODI LINKER  
Federal Public Defender  
Northern District of California

/s

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ELISSE LAROUCHE  
Assistant Federal Public Defender